

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Request for Review of the)	
)	
Decision of the)	CC Docket No. 02-6
Universal Service Administrative Company)	CC Docket No. 96-45
)	
By)	File No. _____
)	
Preble Shawnee Local School District)	
Billed Entity #: 129908)	
471 Application #: 762483)	
Funding Request #: 2060433)	
)	

To: Office of the Secretary, FCC
Attention: Wireline Competition Bureau Chief

REQUEST FOR REVIEW

Pursuant to 47 C.F.R. §54.719(c), Preble Shawnee Local School District ("Preble Shawnee") respectfully requests review of the June 29, 2010 Funding Commitment Decision Letter (the "FCDL," attached as Exhibit A), issued by the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company ("USAC") denying funding for Form 471 # 762483 (attached as Exhibit B) and associated Form 470 # 765850000799684 (attached as Exhibit C). SLD denied Funding Request Number 2060433 because, it claimed, "The documentation provided did not sufficiently demonstrate that the following items: VoIP services or one-time charge of \$29,227.00 is [sic] eligible for discounts according to program rules."¹ As

¹ See Exhibit A.

will be shown, (i) SLD failed to give Preble Shawnee a reasonable opportunity to provide additional support for the amounts requested; (ii) Preble Shawnee's oversight was a ministerial error of the type routinely forgiven by the Commission; and (iii) Preble Shawnee is entitled to E-Rate support in the full amount requested.

BACKGROUND

On December 18, 2009, Mindy Marik, the technology director of Preble Shawnee and the sole contact person for Preble Shawnee, posted Form 470 # 765850000799684 for Funding Year 10, requesting funding for voice over Internet protocol ("VoIP") service. Employees tabulated the bids received for this Form 470 and selected SouthWest Ohio Computer Association ("SWOCA") as a service provider.² On February 17, 2010, 61 days after Preble Shawnee posted its Form 470, it posted Form 471 # 762483. Ms. Marik received acknowledgements of receipt concerning both the Form 470 and the Form 471. On March 24, 2010 Ms. Marik received two emails from Arvind Patel, a PIA auditor, within 10 minutes of each other. The first email referenced Form 471 # 762483 ("VoIP Inquiry," attached as Exhibit E). The second email was for a different Form 471 that Preble Shawnee had filed for Funding Year 10 ("Non-VoIP Inquiry," attached as Exhibit F).

The emails were nearly identical in the beginning, explaining that pre-Kindergarten facilities in Ohio were not eligible for funding and asking five questions designed to determine if Camden Elementary School was a pre-Kindergarten facility. The Non-VoIP Inquiry did not include any additional items. The VoIP Inquiry, however, also asked questions about the products and services being requested. Ms. Marik assumed that the two emails were identical,

² See Contract with SWOCA (attached as Exhibit D).

and, on March 26, 2010, she sent identical responses back (attached as Exhibit G and Exhibit H), which fully addressed the questions about Camden Elementary's eligibility as a K-12 school. Ms. Marik believed she had fully responded to both inquiries. Ms. Marik has never received any further communication concerning the unanswered questions – nor did she have any other reason to believe that further information was needed – until she received the FCDL advising her that the funding request was denied.³

DISCUSSION

I. USAC Did Not Adequately Investigate the Eligibility of Preble Shawnee's Request.

USAC did not undertake adequate measures to determine whether Preble Shawnee's requested services were eligible for funding. In the FCDL, USAC stated that it was denying funding because the documentation provided by Preble Shawnee did not sufficiently demonstrate that the requested "VoIP services or one-time charge of \$29,277.00" were eligible for E-Rate funding.⁴ That determination was inappropriate, because Preble Shawnee was never afforded the full opportunity to show that its request was for eligible services.

USAC has a duty to fully investigate the eligibility of funding requests. The Commission has given USAC responsibility for administering the application process for the E-Rate program. *See Request for Review of the Universal Service Administrator by Bishop Perry Middle School,*

³ The only explanation in the FCDL suggesting why the subject funding request was denied merely faulted "the documentation provided" and did not detail any specific omission. This appeal is premised upon the assumption that the abstract reference in the FCDL was to Preble Shawnee's inadvertent oversight in not responding to the additional portion of the VoIP Inquiry. In the event that the cryptic reference in the FCDL actually was intended to refer to some other problem, then we respectfully submit that the FCDL was incomplete in not explaining the alleged deficiency and that a further opportunity to seek review be provided following prompt and appropriate clarification by SLD.

⁴ See Exhibit A.

21 FCC Rcd 5316, ¶ 3 (2006) ("*Bishop Perry Order*"). In furtherance of the goals of the E-Rate program, the Commission has previously charged USAC with an affirmative duty to fully investigate funding requests. Thus, in *Request for Review by Quinter Public Schools Unified School District No. 293*, 21 FCC Rcd 14122 (2006), the Commission required that internal inconsistencies in information provided by the applicant warranted a more detailed inquiry by USAC. In *Requests for Review of the Universal Service Administrator by State of Arkansas Department of Information Systems et. al.*, 23 FCC Rcd 9373 (2008), the Commission ordered USAC to do outreach and contact applicants that had accidentally failed to file a required form.

Indeed, in *Requests for Review or Waiver of Decisions of the Universal Service Administrator by Brownsville Independent School District, Brownsville, TX, et al.*, 22 FCC Rcd 6045, ¶ 12 (2007) ("*Brownsville*"), the Commission specifically ordered USAC to promptly inform applicants when their response to a request for information regarding a technology plan is deficient and to permit the applicant to submit correct documentation. The Commission explained that it ordered USAC to give applicants the opportunity to submit information to cure minor errors in order to improve the efficiency and effectiveness of the Fund. *Id.*, ¶7.

Here, however, USAC failed to follow the Commission's mandates. As discussed above, Ms. Marik received two-emails within minutes of each other. They appeared to be identical. Preble Shawnee responded within two days. Preble Shawnee overlooked only a portion of USAC's inquiry. Had USAC sent follow-up inquiries, Ms. Marik would have responded with the same expediency she displayed in her prompt response to the March 24, 2010 inquiries, as she affirms in her statement (attached as Exhibit I). Preble Shawnee's prompt response to the PIA auditor clearly indicated a high level of cooperation and signaled at worst a misunderstanding of the scope of information being sought. When PIA received the response

that fully addressed the first set of questions but did not address at all the second set of questions it had a duty to allow the applicant to provide additional support to demonstrate that the subject services are eligible. Had USAC informed Preble Shawnee that it had failed to supply the requested VOIP documentation, Ms. Marik would have promptly provided it.⁵ USAC then should have ascertained that the services requested by Preble Shawnee were eligible.⁶

II. Preble Shawnee's Error Was Ministerial and Should Be Overlooked.

At worst, Preble Shawnee's inadvertent failure to respond to the VOIP questions was a ministerial error. The Commission has repeatedly held that, in the absence of waste, fraud and abuse, applicants should be permitted to correct ministerial errors. The Commission has consistently acknowledged that many E-Rate beneficiaries, especially small districts, find the application process for public funds to be complicated, resulting in significant numbers of denials of applications for E-Rate support on the basis of ministerial, clerical or procedural errors. *See, e.g., Bishop Perry Order*, ¶ 2. For years, the Commission has held that, in cases of such minor procedural violations, where there is no evidence of waste, fraud, or abuse, "rigid compliance with USAC's procedures does not further the purposes of section 254(h) [of Communication Act] or serve the public interest.." *Id.*, ¶ 11. As the Commission noted in the *Bishop Perry Order*, "the primary jobs of most of the people filling out these forms include school administrators, technology coordinators and teachers, as opposed to positions dedicated to pursuing federal grants, especially in small school districts." *Id.*, ¶ 14. Ms. Marik, a technology

⁵ *See Exhibit I*, ¶ 11.

⁶ In *Requests for Review of the Decisions of the Universal Service Administrator by Aiken County Public Schools, Aiken, SC, et al.*, 22 FCC Rcd 8735 (2007), the Commission held that: "if USAC assists applicants in removing ineligible services from funding requests prior to issuing its funding commitment decisions, USAC should be able to reduce administrative costs that it would otherwise spend on appeals of the funding requests it denies." Had USAC followed this requirement, Preble Shawnee would have been spared the burden of pursuing the present appeal and the administrative costs imposed on the FCC, USAC and Preble Shawnee would have been avoided.

director, was not conversant with the highly detailed and technical requirements of filling out federal forms; rather, she was hired to ensure that her schools had the technology they needed to best educate their students.⁷

The Commission has specifically found that a failure to respond to USAC inquiries was a mere oversight and did not merit a full rejection of the application. *See Requests for Review of the Universal Service Administrator by Excellence Charter School of Bedford-Stuyvesant Brooklyn, New York, et. al.*, 23 FCC Rcd. 15406 (2008) (“*Excellence Order*”). The Commission recognized that these appeals involve a processing deadline, rather than a rule essential to serving the goals of the E-Rate program. *Id.*, ¶ 5. Indeed, the Commission has granted numerous requests for review by applicants who **failed to respond at all** to USAC inquiries or who responded late. *See, e.g., Excellence Order*. If anything, Preble Shawnee’s mistake – an accidental partial omission in a timely-filed response – was even more clearly a procedural error than the failures to have responded at all that were deemed inconsequential in the *Excellence Order*.

Ms. Marik received two nearly identical PIA inquiry emails, sent within a matter of a few minutes of each other. The formatting of the VOIP Inquiry email led Ms. Marik to mistakenly believe that the PIA was asking the same set of questions as the Non-VOIP Inquiry email.⁸ A review of the two similar emails indicates the ease with which such a mistake could have been made. Given USAC’s duty to reach out to applicants and investigate whether all relevant information has been received, at a minimum PIA should have advised Preble Shawnee that the inquiry in the second part of the email had not been received. Ms. Marik never received any such communication from PIA, so she had no reason to think more information was needed.

⁷ See *Exhibit I*, ¶ 3.

⁸ See *Exhibit I*, ¶¶ 8-9.

The Commission has time and again held that when a violation is procedural, and not substantive, “complete rejection of each of these applications is not warranted.” *See, e.g., Bishop Perry Order*, ¶ 14; *Brownsville*, ¶8; *Excellence Order*, ¶8 (2008). It specifically found this very error – failure to fully respond to a PIA inquiry – to be an excusable procedural error in *Excellence*. Therefore, the Commission should grant Preble Shawnee the same lenience it granted Excellence Charter School.

III. Preble Shawnee Is Entitled to the Funding Requested, Which Will Serve the Purposes of the E-Rate Program.

Preble Shawnee is entitled to funding for the VoIP service requested. The Commission includes interconnected VoIP as an eligible service irrespective of whether provided by a telecommunications provider or an Internet services provider.⁹ In the VoIP Inquiry, USAC asked for “more detailed documentation that identifies the actual products and services being requested.”¹⁰ The services comprising Preble Shawnee’s costs include VoIP service (with voicemail) installation, configuration and a share of the maintenance fees for the SWOCA-owned, premise-based core equipment.¹¹ These are eligible for funding.¹² The VoIP Inquiry also

⁹ *See* Eligible Services List, Schools and Libraries Support Mechanism for Funding Year 2010, http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-09-105A2.pdf, at 2 (“2010 Eligible Services List”).

¹⁰ *See* Exhibit E.

¹¹ SWOCA describes these services as “Shared use of SWOCA –owned core equipment located at SWOCA., PRI line, UCSS for CM for 72 phones, UCSS and ESW for 72 VM boxes, Installation and configuration (major component of non-recurring costs), Management of system includes Moves, Adds and Changes and Maintenance on handsets.” *See Letter from Michael Crumley*, attached as Exhibit J, p.2). Mr. Crumley also notes that “Ineligible portion of SWOCA-owned premise-based equipment is an “ineligible” service and is cost-allocated in the above information.” This equipment includes four Cisco routers used as Voice Gateways (models CISCO2921-CME-SRST/K9 and CISCO2921-CME0SRST/K9). (See Exhibit J, p. 2).

¹² *See* 2010 Eligible Services List, ¶¶ 22, 9 (stating that “[i]nallation, activation, and initial configuration of eligible components are eligible if they are part of a contract or bid for those eligible components” and that “maintenance and technical support appropriate to maintain reliable operation is eligible for discount when provided as a component of an eligible Internet access service.”)

requests information regarding the “actual products and services relating to [the one-time charge of \$29,227.00].”¹³ As Mr. Crumley notes in his letter, the non-recurring costs include installation and configuration of VoIP equipment.¹⁴ Because the requested VoIP services were eligible for funding, the Commission should grant this Request for Review and award Preble Shawnee the full amount requested.

The Commission has consistently found that the E-Rate application process can be confusing to school administrators, and that these applicants should not be denied funding because of their confusion. *See, e.g., Bishop Perry Order*. As set forth in her attached statement, Ms. Marik was in a comparable situation. Without E-Rate funding, Preble Shawnee would not be able to provide the Internet access it currently provides to its students. In fact, Preble Shawnee, a small public school district, is precisely the kind of entity for which section 254(h) of the Communications Act seeks “to ensure affordable access to and use of” telecommunications services and the type of applicant that deserves the Commission’s lenience.

The goals of the E-Rate program are simple: section 254 of the Communications Act directs the Commission to “enhance . . . access to advanced telecommunications and information services for all public and non-profit elementary and secondary school classrooms, health care providers and libraries.”¹⁵ The Commission has previously found that, in granting waivers of procedural rules, it could “provide for a more effective application processing system that will ensure eligible schools and libraries will be able to realize the intended benefits of the E-rate program” *See Bishop Perry Order*, ¶ 2. This purpose is vital to the educational process in this country. Indeed, for students to obtain the full advantages of their education, schools need

¹³ *See Exhibit E*.

¹⁴ *See Exhibit J*, p. 1.

¹⁵ *See* 47 U.S.C. § 254(h).

up-to-date technology, which few could afford without the E-Rate program. Therefore, the public interest is not served by penalizing a small district like Preble Shawnee, and the students it educates, for purely ministerial errors in a complex, highly specialized and often confusing application process.

Relief Requested

For the foregoing reasons, Preble Shawnee Local School District respectfully requests that the Commission grant its request for review, reverse USAC's decision denying funding, and order USAC to fund the entire amount requested in Preble Shawnee's initial funding request.

Respectfully submitted,

PREBLE SHAWNEE LOCAL SCHOOL
DISTRICT

By: Mark J. Patchick / SBM
Mark J. Patchick
Peter Gutmann
Sarah Miller

Womble Carlyle Sandridge & Rice, PLLC
1401 I Street, N.W., Seventh Floor
Washington, DC, 20005
(202) 857-4400
(202) 467-6910 (fax)

**CC: Universal Service Administrator
Universal Service Ombudsman**

August 27, 2010

CERTIFICATE OF SERVICE

I, Sarah Miller, hereby declare that copies of the foregoing request for review were delivered by hand or by U.S. mail, this day, August 27, 2010, to the following, as required by section 54.721(c) of the Commission's rules:

David Capozzi
Acting General Counsel
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036

Letter of Appeal
Schools and Libraries Division – Correspondence Unit
100 S. Jefferson Rd
P.O. Box 902
Whippany, NJ 07981


Sarah Miller

WCSR 4441979v7

EXHIBIT A

USAC

Schools and Libraries Division
Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

*VoIP
denial*

TIME SENSITIVE MATERIAL

00370
MINDY MARIK
PREBLE SHAWNEE SCHOOL DISTRICT
124 BLOOMFIELD ST
CAMDEN, OH 45311-1154



FUNDING COMMITMENT DECISION LETTER
(Funding Year 2010: 07/01/2010 - 06/30/2011)

June 29, 2010

MINDY MARIK
PREBLE SHAWNEE SCHOOL DISTRICT
124 BLOOMFIELD ST
CAMDEN, OH 45311-1154

Re: Form 471 Application Number: 762483
Billed Entity Number (BEN): 129908
Billed Entity FCC RN: 0003021169
Applicant's Form Identifier: PS10471VIP

Thank you for your Funding Year 2010 application for Universal Service Support and for any assistance you provided throughout our review. The current status of the funding request(s) in the Form 471 application cited above and featured in the Funding Commitment Report(s) (Report) at the end of this letter is as follows.

- The amount, \$39,283.78 is "Approved."
- The amount, \$31,321.53 is "Denied."

Please refer to the Report following this letter for specific funding request decisions and explanations. The Universal Service Administrative Company (USAC) is also sending this information to your service provider(s) so preparations can begin for implementing your approved discount(s) after you file FCC Form 486, Receipt of Service Confirmation Form. A guide that provides a definition for each line of the Report is available in the Reference Area of our website.

NEXT STEPS

- Work with your service provider to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full
- Review technology planning approval requirements
- Review CIPA requirements
- File Form 486
- Invoice USAC using the Form 474 (service provider) or Form 472 (Billed Entity applicant) - as products and services are being delivered and billed

TO APPEAL THIS DECISION:

You have the option of filing an appeal with the SLD or directly with the Federal Communications Commission (FCC).

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and (if available) email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the letter and the decision you are appealing:
 - Appellant name,
 - Applicant name and service provider name, if different from appellant,
 - Applicant BEN and Service Provider Identification Number (SPIN),
 - Form 471 Application Number 762483 as assigned by USAC,
 - "Funding Commitment Decision Letter for Funding Year 2010," AND

- The exact text or the decision that you are appealing.
- 3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
- 4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
- 5. Provide an authorized signature on your letter of appeal.

To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542.

To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal
Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

If you wish to appeal a decision in this letter to the FCC, you should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. We strongly recommend that you use the electronic filing options described in the "Appeals Procedure" posted in the Reference Area of our website. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554.

OBLIGATION TO PAY NON-DISCOUNT PORTION

Applicants are required to pay the non-discount portion of the cost of the products and/or services to their service provider(s). Service providers are required to bill applicants for the non-discount portion. The FCC stated that requiring applicants to pay their share ensures efficiency and accountability in the program. If USAC is being billed via the FCC Form 474, the service provider must bill the applicant at the same time it bills USAC. If USAC is being billed via the FCC Form 472, the applicant pays the service provider in full (the non-discount plus discount portion) and then seeks reimbursement from USAC. If you are using a trade-in as part of your non-discount portion, please refer to our website for more information.

NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds. The timing of payment of invoices may also be affected by the availability of funds based on the amount of funds collected from contributing telecommunications companies.

Schools and Libraries Division
Universal Service Administrative Company

==

FUNDING COMMITMENT REPORT
Billed Entity Name: PREBLE SHAWNEE SCHOOL DISTRICT
BEN: 129908
Funding Year: 2010

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 762483
Funding Request Number: 2060261
Funding Status: Funded
Category of Service: Internet Access
Form 470 Application Number: 164190000725129
SPIN: 143024429
Service Provider Name: SouthWest Ohio Computer Association
Contract Number: PS-1-09
Billing Account Number: N/A
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2010
Service End Date: N/A
Contract Award Date: 02/11/2009
Contract Expiration Date: 06/30/2014
Shared Worksheet Number: 1254547
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$56,119.68
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$56,119.68
Discount Percentage Approved by the USAC: 70%
Funding Commitment Decision: \$39,283.78 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: MRI: The FRN was modified from
\$4761.61/month to \$4676.64/month to agree with the applicant documentation.

FCDL Date: 06/29/2010

Wave Number: 006

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2011

FUNDING COMMITMENT REPORT
Billed Entity Name: PREBLE SHAWNEE SCHOOL DISTRICT
BEN: 129908
Funding Year: 2010

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 762483
Funding Request Number: 2060433
Funding Status: Not Funded
Category of Service: Internet Access
Form 470 Application Number: 765850000799684
SPIN: 143024429
Service Provider Name: SouthWest Ohio Computer Association
Contract Number: PS-VOIP-2010
Billing Account Number: N/A
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2010
Service End Date: N/A
Contract Award Date: 02/10/2010
Contract Expiration Date: 06/30/2013
Shared Worksheet Number: 1254547
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$15,518.04
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$29,227.00
Pre-discount Amount: \$44,745.04
Discount Percentage Approved by the USAC: 70%
Funding Commitment Decision: \$0.00 - Insufficient documentation
Funding Commitment Decision Explanation: DR1: The documentation provided did not sufficiently demonstrate that the following items: VOIP services or one-time charge of \$29,227.00 is eligible for discounts according to program rules.

FCDL Date: 06/29/2010

Wave Number: 006

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2011

EXHIBIT B

FCC Form 471	Do not write in this area.	Approval by OMB 3060-0806
Schools and Libraries Universal Service Description of Services Ordered and Certification Form 471 Estimated Average Burden Hours per Response: 4 hours This form asks schools and libraries to list the eligible telecommunications-related services they have ordered and estimate the annual charges for them so that the Fund Administrator can set aside sufficient support to reimburse providers for services. Please read instructions before beginning this application. (You can also file online at www.sl.universalservice.org .) The instructions include information on the deadlines for filing this application.		
Applicant's Form Identifier (Create your own code to identify THIS form 471)		Form 471 Application# (To be assigned by administrator)
PS10471VIP		762483
Block 1: Billed Entity Information (The "Billed Entity" is the entity paying the bills for the service listed on this form.)		
1 a	Name of Billed Entity PREBLE SHAWNEE SCHOOL DISTRICT	
2 a	Funding Year: July 1, 2010 Through June 30, 2011 Billed Entity Number: 129908	
4 a	Street Address, P.O. Box, or Routing Number 124 BLOOMFIELD ST	
	City CAMDEN	
	State OH	
	Zip Code 45311 1154	
b	Telephone Number 937-452-1284	
	c Fax Number 937-452-3926	
5 a	Type of Application <input type="checkbox"/> Individual School (individual public or non-public school) <input checked="" type="checkbox"/> School District (LEA; public or non-public [e.g. diocesan] local district representing multiple schools) <input type="checkbox"/> Library (including library system, library outlet/branch or library consortium as defined under LSTA) <input type="checkbox"/> Consortium <input type="checkbox"/> Check here if any members of this consortium are ineligible or non-governmental entities	
6	Contact Person's Name MINDY MARIK	
First, if the Contact Person's Street Address is the same as in Item 4, check this box. <input type="checkbox"/> If not, please complete the entries for the Street Address below.		
b	Street Address, P.O. Box, or Routing Number 124 BLOOMFIELD ST	
	City CAMDEN	
	State OH	
	Zip Code 45311 1154	
<input type="checkbox"/> c	Telephone Number 937-452-1284	
	<input type="checkbox"/> d Fax Number 937-452-3926	
<input checked="" type="checkbox"/> e	E-mail Address pss-mm@swoca.net	
f	Holiday/vacation/summer contact information	



Entity Number <u>129908</u> Contact Person <u>MINDY MARIK</u>	Applicant's Form Identifier <u>PS10471VIP</u> Phone Number <u>937-452-1284</u>
--	---

This information will facilitate the processing of your applications. Please complete all rows that apply to services for which you are requesting discounts. Complete this information on the FIRST Form 471 you file, to encompass this and all other Forms 471 you will file for this funding year. You need not complete this information on subsequent Forms 471. Provide your best estimates for the services ordered across ALL of your Forms 471.

Schools/school districts complete Item 7. Libraries complete Item 8. Consortia complete Item 7 and/or Item 8.

Block 2: Impact of Services Ordered on Schools

IF THIS APPLICATION INCLUDES SCHOOLS...		BEFORE ORDER	AFTER ORDER
7a	Number of students to be served		1395
e	Direct connections to the Internet: Number of drops	138	138
f	Number of classrooms with Internet access	107	107
g	Number of computers or other devices with Internet access	645	645

Block 3: Impact of Services Ordered on Libraries

NOT APPLICABLE AS THIS APPLICATION IS FOR DISTRICT

Worksheet A No: 1254547

Student Count: 1395

Weighted Product (Sum. Column 8): 976.5

Shared Discount: 70%

1. School Name: CAMDEN ELEMENTARY SCHOOL

2. Entity Number: 50093 NCES: 39 04928 03549

3. Rural/Urban: Rural

4. Student Count: 439

5. NSLP Students: 196

6. NSLP Students/Students: 44.646%

7. Discount: 70%

8. Weighted Product: 307.3

9. Pre-K/Adult Ed/Juv:

10. Alt Disc Mech:

1. School Name: SHAWNEE HIGH SCHOOL

2. Entity Number: 50094 NCES: 04928 03550

3. Rural/Urban: Rural

4. Student Count: 613

5. NSLP Students: 235

6. NSLP Students/Students: 38.336%

7. Discount: 70%

8. Weighted Product: 429.1

9. Pre-K/Adult Ed/Juv:

10. Alt Disc Mech:

1. School Name: WEST ELKTON ELEMENTARY SCHOOL

2. Entity Number: 49558 NCES: 04928 03551

3. Rural/Urban: Rural

4. Student Count: 343

5. NSLP Students: 127

6. NSLP Students/Students: 37.026%

7. Discount: 70%

8. Weighted Product: 240.1

9. Pre-K/Adult Ed/Juv:

10. Alt Disc Mech:

Block 5: Discount Funding Request(s)

FRN: 2060261

FCDL Date:

10. Original FRN:

11. Category of Service: Internet Access

12. 470 Application Number: 164190000725129

13. SPIN: 143024429

14. Service Provider Name: SouthWest Ohio
Computer Association

15a. Non-Contracted tariffed/Month to Month
Service:

15b. Contract Number: PS-1-09

15c. Covered under State Master Contract:	15d. FRN from Previous Year:
16a. Billing Account Number: N/A	16b. Multiple Billing Account Numbers?:
17. Allowable Contract Date: 02/11/2009	18. Contract Award Date: 02/11/2009
19a. Service Start Date: 07/01/2010	19b. Service End Date:
20. Contract Expiration Date: 06/30/2014	
21. Attachment #: SWOCAYR2	22. Block 4 Worksheet No.: 1254547
23a. Monthly Charges: \$4,761.61	23b. Ineligible monthly amt.: \$0.00
23c. Eligible monthly amt.: \$4,761.61	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$57,139.32	
23f. Annual non-recurring (one-time) charges: 0	23g. Ineligible non-recurring amt.: 0
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$0.00	
23i. Total program year pre-discount amount (23e + 23h): \$57,139.32	
23j. % discount (from Block 4): 70	
23k. Funding Commitment Request (23i x 23j): \$39,997.52	

FRN: 2060433	FCDL Date:
10. Original FRN:	
11. Category of Service: Internet Access	12. 470 Application Number: 765850000799684
13. SPIN: 143024429	14. Service Provider Name: SouthWest Ohio Computer Association
15a. Non-Contracted tariffed/Month to Month Service:	15b. Contract Number: PS-VOIP-2010
15c. Covered under State Master Contract:	15d. FRN from Previous Year:
16a. Billing Account Number: N/A	16b. Multiple Billing Account Numbers?:
17. Allowable Contract Date: 01/15/2010	18. Contract Award Date: 02/10/2010
19a. Service Start Date: 07/01/2010	19b. Service End Date:
20. Contract Expiration Date: 06/30/2013	
21. Attachment #: SWOCAVOIP1	22. Block 4 Worksheet No.: 1254547
23a. Monthly Charges: \$1,353.17	23b. Ineligible monthly amt.: \$60.00
23c. Eligible monthly amt.: \$1,293.17	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$15,518.04	
23f. Annual non-recurring (one-time) charges: 32089	23g. Ineligible non-recurring amt.: 2862
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$29,227.00	
23i. Total program year pre-discount amount (23e + 23h): \$44,745.04	
23j. % discount (from Block 4): 70	
23k. Funding Commitment Request (23i x 23j): \$31,321.53	

Block 6: Certifications and Signature

Application ID: 762483

Do not write in this area.

Entity Number	129908	Applicant's Form Identifier	PS10471VIP
Contact Person	MINDY MARIK	Phone Number	937-452-1284

Block 6: Certifications and Signature

24. ☒ I certify that the entities listed in Block 4 of this application are eligible for support because they are: (check one or both)
schools under the statutory definitions of elementary and secondary schools found in the No Child Left

- a. ☒ Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38), that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
- b. ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools including, but not limited to elementary, secondary schools, colleges, or universities
25. ☒ I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed in this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

a.	Total funding year pre-discount amount on this Form 471 (Add the entities from Item 23l on all Block 5 Discount Funding Requests.)	\$100,864.72
b.	Total funding commitment request amount on this Form 471 (Add the entities from Items 23K on all Block 5 Discount Funding Requests.)	\$70,605.31
c.	Total applicant non-discount share (Subtract Item 25b from Item 25a.)	\$30,259.41
d.	Total budgeted amount allocated to resources not eligible for E-rate support	\$0.00
e.	Total amount necessary for the applicant to pay the non-discount share of the services requested on this application AND to secure access to the resources necessary to make effective use of the discounts. (Add Items 25c and 25d.)	\$30,259.41
f.	<input type="checkbox"/> Check this box if you are receiving any of the funds in Item 25e directly from a service provider listed on any Forms 471 filed by this Billed Entity for this funding year, or if a service provider listed on any of the Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds in Items 25e.	

26. ☒ I certify that all of the schools and libraries or library consortia listed in Block 4 of this application are covered by technology plans that are written, that cover all 12 months of the funding year, and that have been or will be approved by a state or other authorized body, and an SLD-certified technology plan approver, prior to the commencement of service. The plans are written at the following level(s):
- a. ☐ an individual technology plan for using the services requested in this application; and/or
- b. ☒ higher-level technology plan(s) for using the services requested in this application; or
- c. ☐ no technology plan needed; applying for basic local, cellular, PCS, and/or long distance telephone service and/or voice mail only.
27. ☒ I certify that I posted my Form 470 and (if applicable) made my RFP available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology plan goals.



28. ☒ I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.
29. ☒ I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. Sec. 54.500(k). Additionally, I certify that the Billed Entity has not received anything of value or a promise of anything of value, other than services and equipment requested under this form, from the service provider(s) or any representative or agent thereof or any consultant in connection with this request for services.
30. ☒ I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts covering all of the services listed on this Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.
31. ☒ I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

32. ☒ I certify that I will retain required documents for a period of at least five years after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to the Administrator. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.
33. ☒ I certify that I am authorized to order telecommunications and other supported services for the eligible entity (ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity (ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of this program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under the Title 18 of the United States Code, 18 U.S.C. Sec. 1001 and civil violations of the False Claims Act.
34. ☒ I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.
35. ☒ I certify that if any of the Funding Requests on this Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the cost of the contract to eligible and ineligible companies as required by the Commission's rules at 47 C.F.R. Sec. 54.504(g)(1),(2).
36. ☒ I certify that this funding request does not constitute a request for internal connections services, except basic maintenance services, in violation of the Commission requirement that eligible entities are not eligible for such support more than twice every five funding years beginning with Funding Year 2005 as required by the Commission's rules at 47 C.F.R. Sec. 54.506(c).
37. ☒ I certify that the non-discounted portion of the costs for eligible services will not be paid by the service provider. The pre-discount costs of eligible services features on this Form 471 are net of any rebates or discounts offered by the service provider. I acknowledge that, for the purpose of this rule, the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.

38. Signature of authorized person

39. Signature Date 2/17/2010

40. Printed name of authorized person
Dale Robertson

41. Title or position of authorized person
Superintendent

42a. Street Address, P.O Box or Route Number
124 Bloomfield Street
City, State Zip Code
Camden, OH 45311

42b. Telephone number of authorized person:
(937) 452-1283

42c. Fax number of authorized person:
(937) 392-3926

42d. E-mail of authorized person:
pssu_dr@swoca.net

42e. Name of authorized person's employer
Preble Shawnee Local Schools

The Americans with Disabilities Act, the Individuals with Disabilities Education Act and the Rehabilitation Act may impose obligations on entities to make the services purchased with these discounts accessible to and usable by people with disabilities.

NOTICE: Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public.

If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

Please submit this form to:

**SLD-Form 471
P.O. Box 7026
Lawrence, Kansas 66044-7026**

**For express delivery services or U.S. Postal Service, Return Receipt Requested,
mail this form to:**

**SLD Forms
ATTN: SLD Form 471
3833 Greenway Drive
Lawrence, Kansas 66046
(888) 203-8100**

[Print](#)

[<< Previous](#)

1997 - 2010 ©, Universal Service Administrative Company, All Rights Reserved

**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

[Block 1](#)[Block 2 & 3](#)[Block 4](#)[Block 5](#)[Block 6](#)

471 Application No: 762483

Funding Year: 07/01/2010 - 06/30/2011

Cert. Postmark Date: 02/17/2010

Form Status: CERTIFIED - In Window

RAL Date: 02/23/2010

Out of Window Letter Date: Not applicable

No Miscellaneous Details are available at this time.

[Previous](#)[Display Entire Application](#)

1997 - 2010 © , Universal Service Administrative Company, All Rights Reserved



Item 21 Attachment
Internet Access - Funding Year 2010

Applicant Name	PREBLE SHAWNEE SCHOOL DISTRICT
Billed Entity Number	129908
Form 471 Application Number	762483
Funding Request Number	2060433
Service Provider	SouthWest Ohio Computer Association
Attachment Number	SWOCAVOIP1
Narrative description of this Funding Request	District wide interconnected VOIP including voicemail for 67 phones.

Service Type	Service Description	Eligible Pre-Discount Cost
1 VoIP Service	District wide Interconnected VOIP service including voicemail for 67 phones.	\$44,745.04
	Number of InternetAccess Lines (if applicable)	0
	Recurring Charges	Non Recurring Charges
Monthly Recurring Charges	\$1,353.17	One-time non-recurring charges \$32,089.00
Less Ineligible Amount (if any)	\$60.00	Less Ineligible Amount (if any) \$2,862.00
Number of Months	12	
Eligible recurring charges	\$15,518.04	Eligible non-recurring charges \$29,227.00
		Line item TOTAL \$44745.04
	Total:	\$44,745.04
	Funding Requested on 471:	\$44,745.04

Date Submitted 2/17/2010 2:21:54 PM



Item 21 Attachment
Internet Access - Funding Year 2010

Applicant Name	PREBLE SHAWNEE SCHOOL DISTRICT
Billed Entity Number	129908
Form 471 Application Number	762483
Funding Request Number	2060261
Service Provider	SouthWest Ohio Computer Association
Attachment Number	SWOCAYR2
Narrative description of this Funding Request	Basic Conduit Internet Access, firewall services and email for all buildings in the school district at a maximum bandwidth of 1024 Mbps.

Service Type	Service Description	Eligible Pre-Discount Cost
1	Basic Conduit Internet Access, firewall services and email for all buildings in the school district at a maximum bandwidth of 1024 Mbps.	
Other		\$57,139.32
	Number of InternetAccess Lines (if applicable)	0
	Recurring Charges	Non Recurring Charges
Monthly Recurring Charges	\$4,761.61	One-time non-recurring charges \$0.00
Less Ineligible Amount (if any)	\$0.00	Less Ineligible Amount (If any) \$0.00
Number of Months	12	
Eligible recurring charges	\$57,139.32	Eligible non-recurring charges \$0.00
		Line item TOTAL \$57139.32
	Total:	\$57,139.32
	Funding Requested on 471:	\$57,139.32

Date Submitted 2/17/2010 2:26:40 PM

EXHIBIT C

FCC Form 470

Universal Service Program Description of Services Requested and Certification Form



Entity Number: 129908
Contact Person: Mindy Marik

Applicant's Form Identifier: PS10470VIP
Phone Number: (937)452-1284

FCC Form

Approval by OMB
3060-0806

Do not write in this area

470

Schools and Libraries Universal Service Program Description of Services Requested and Certification Form

Form 470 Application Number: 765850000799684

19. ☒ I certify that the applicant includes: (Check one or both)

- a. ☒ schools under the statutory definitions of elementary and secondary schools found in the **No Child Left Behind Act of 2001, 20 U.S.C Secs. 7801(18) and (38)**, that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
- b. ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any school (including, but not limited to elementary and secondary schools, colleges and universities).

20. ☒ I certify that all of the individual schools, libraries, and library consortia receiving services under this application are covered by technology plans that are written, that cover all 12 months of the funding year, and that have been or will be approved by a state or other authorized body, an SLD-certified technology plan approver, prior to the commencement of service. The plans were written at the following level(s):

- a. ☐ individual technology plans for using the services requested in the application; and/or
- b. ☒ higher-level technology plans for using the services requested in the application; or
- c. ☐ no technology plan needed; application requests basic local, cellular, PCS and/or long distance telephone service and/or voice mail only.

21. ☒ I certify that I will post my Form 470 and (if applicable) make my RFP available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted will be carefully considered and the bid selected will be for the most cost-effective service or equipment offering, with price being the primary factor, and will be the most cost-effective means of meeting educational needs and technology plan goals. I certify that I will retain required documents for a period of at least five years after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools, and libraries discounts. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.

22. ☒ I certify that the services the applicant purchases at discounts provided by U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. Sec.

54.500(k). Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

23. ☒ I acknowledge that support under this support mechanism is conditional upon the school(s) and/or library(ies) I represent securing access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity necessary to use the service purchased effectively. I recognize that some of the aforementioned resources are not eligible for support.

24. ☒ I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies). I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

25. ☒ I certify that I have reviewed all applicable state and local procurement/competitive bidding requirements and that I have complied with them. I acknowledge that persons willfully making false statements on this form can be punished by the fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

26. ☒ I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program.

27. Cert ID = 529672	28. Date 12/18/2009
29. Printed name of authorized person Dale Robertson	
30. Title or position of authorized person Superintendent	
31a. Street Address, P.O Box or Route Number 124 Bloomfield Street Camden, OH 45311	
31b. Telephone number of authorized person: (937) 452-1283	
31c. Fax number of authorized person: (937) 452-3926	
31d. E-mail of authorized person: pssu_dr@swoca.net	
31e. Name of authorized person's employer:	
ATTENTION: If you are signing Form 470 using the PIN assigned to you by SLD, you are reminded that using the PIN is equivalent to your handwritten signature on the form. Your use of the PIN to affirm these certifications means that should they prove untrue, you will be held to the same enforcement standards as those who affirm the certifications on paper. Also, by using the PIN, you are affirming that you have the authority to make these certifications and represent the entity featured in Block One of this funding request.	
Please Check to affirm your compliance <input checked="" type="checkbox"/>	

Form 470 Application Number:
PREBLE SHAWNEE SCHOOL DISTRICT
124 BLOOMFIELD ST
CAMDEN, OH 45311-1154

**Service provider involvement with preparation or certification of a Form 470
can taint the competitive bidding process and result in the denial of funding requests.
For more information, refer to the SLD web site at
www.sl.universalservice.org or call the SLD Client Service Bureau at 1-888-203-8100.**

NOTICE: Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Description of Services Requested and Certification Form (FCC Form 470) with the Universal Service Administrator, 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, information provided in or submitted with this form or in response to subsequent inquiries may also be subject to disclosure consistent with the Communications Act of 1934, FCC regulations, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law.

If you owe a past due debt to the federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.



Form 470 - Application Number and Security Code

Entity Number:
129908

Entity Name: PREBLE SHAWNEE SCHOOL
DISTRICT

Form 470 Application Number: **765850000799684**

Form 470 Security Code: **76585**

**IMPORTANT: PLEASE RECORD YOUR FORM 470 APPLICATION
NUMBER AND SECURITY CODE. IF YOU EXIT BEFORE
COMPLETING THIS INTERVIEW, YOU WILL NEED THESE TWO
NUMBERS TO RETURN TO THIS INTERVIEW.**

Create your own code to identify your form.

Applicant's Form Identifier: **PS10470VIP**

[SLD Home](#) | Client Service Bureau: 1-888-203-8100

©1997-2009 , Universal Service Administrative Company, All Rights Reserved

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Do not write in this space.

Approval by OMB
3080 -- 0806

Schools and Libraries Universal Service
Description of Services Requested and Certification Form 470
Estimated Average Burden Hours Per Response : 4 hours

This form is designed to help you describe the eligible telecommunications-related services you seek so that this data can be posted on the Fund Administrator Web Site and interested service providers can identify you as a potential customer and compete to serve you.
Please read instructions before beginning this application. (You can also file online at www.sl.universalservice.org)

Form 470 Details

Applicant's Form Identifier(Create your own code to identify THIS Form 470)
PS10470VIP

Form 470 Application # :
765850000799684

(To be assigned by administrator)

Block 1: Applicant Address and Identifications**1. Name of Applicant**

PREBLE SHAWNEE SCHOOL DISTRICT

2. Funding Year

July 1, 2010 through June 30, 2011

3. Your Entity Number

129908

4a Street Address, P.O. Box, or Route Number

124 BLOOMFIELD ST

City

CAMDEN

State

OH

Zip Code

45311 - 1154

b Telephone Number

937-452-1284

c Fax Number

937-452-3928

5 Type of Application

- ☒ Individual School (Individual public or non-public school)
- ☒ School District (LEA: public or non-public [e.g. diocesan] local district representing multiple schools)
- ☒ Library (including library system, library outlet/branch or library consortium as defined under LSTA)
- ☒ Consortium (intermediate service agencies, states, state networks, special consortia of schools and/or libraries)

Entity Number : 129908		Applicant's Form Identifier : PS10470VIP	
Contact Person : Mindy Marik		Contact Telephone Number : 937-452-1284	
Block 1: Applicant Address and Identifications(continued)			
6a Contact Person's Name Mindy Marik			
First, if the Contact Person's Street Address is the same as in Item 4 above, check this box. <input checked="" type="checkbox"/> If not, please complete the entries for the Street Address below.			
b Street Address, P.O. Box, or Route Number 124 BLOOMFIELD ST			
City CAMDEN			
State OH		ZipCode 45311- 1154	
Check the box next to your preferred mode of contact and provide your contact information. One box MUST be checked and and entry provided.			
<input checked="" type="checkbox"/> c Telephone Number 937-452-1284		<input type="checkbox"/> d Fax Number 937-452-3926	
<input type="checkbox"/> e E-mail Address psss_mm@swoca.net			
Block 2: Summary Description of Needs or Services Requested			
7 This Form 470 describes (check all that apply):			
a <input checked="" type="checkbox"/> Tariffed services or month-to-month services to be provided without a written contract. A new Form 470 must be filed for non-contracted tariffed or month-to-month services for each funding year.			
b <input checked="" type="checkbox"/> Services for which a new written contract is sought for the funding year in Item 2.			
Check if you are seeking <input checked="" type="checkbox"/> a multi-year contract and/or <input checked="" type="checkbox"/> a contract featuring voluntary extensions.			
c <input checked="" type="checkbox"/> A multi-year contract signed on or before 7/10/97 but for which no Form 470 has been filed in a previous program year.			
<small>NOTE: Services that are covered by a signed, written contract executed pursuant to posting of a Form 470 in a previous funding year OR a contract signed on/before 7/10/97 and previously reported on a Form 470 as an existing contract do NOT require filing of a new Form 470.</small>			
What kinds of service are you seeking: Telecommunications Services, Internet Access, Internal Connections Other than Basic Maintenance, or Basic Maintenance of Internal Connections? Refer to the Eligible Services List at www.sl.universalservice.org for example. Check the relevant category or categories (8,9,10 and/or 11 below), and answer the questions in each category you select.			

Entity Number : 129908

Applicant's Form Identifier : PS10470VIP

Contact Person : Mindy Marik

Contact Telephone Number : 937-452-1284

Block 2: Summary Description of Needs or Services Requested(Continued)

8 Telecommunications Services

Do you have a Request for Proposal(RFP) that specifies the services you are seeking? If you check YES, your RFP must be available to all interested bidders for at least 28 days. If you check YES and your RFP is not available to all interested bidder, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.

☒ YES, I have released or intend to release an RFP for these services. It is available or will become available on the Web at:

a

or via (check one) ☒ the Contact Person in Item 6 or

☒ the Technical Contact Person in Item 12.

b ☒ NO. I have not released and do not intend to release an RFP for these services.

Whether you check YES or NO, you must list below the Telecommunications Services you seek. Specify each service or function (e.g. local voice service) and quantity and/or capacity(e.g. 20 existing lines plus 10 new ones.) See the Eligible Services List at www.sl.universalservice.org for examples of eligible Telecommunications Services. Remember that only eligible telecommunications providers can provide these services under the universal service support mechanism.

☒ Check this box if you prefer discounts on your bill.

☒ Check this box if you prefer reimbursement after paying your bill in full

☒ Check this box if you do not have a preference.

Entity Number : 129908

Applicant's Form Identifier : PS10470VIP

Contact Person : Mindy Marik

Contact Telephone Number : 937-452-1284

Block 2: Summary Description of Needs or Services Requested(Continued)

9 Internet Access

Do you have a Request for Proposal(RFP) that specifies the services you are seeking? If you check YES, your RFP must be available to all interested bidders for atleast 28 days. If you check YES and your RFP is not available to all interested bidder, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.

☒ YES, I have released or intend to release an RFP for these services. It is available or will become available on the Web at:

a

or via (check one) ☐ the Contact Person in Item 6 or

☒ the Technical Contact Person in Item 12.

b

☒ NO. I have not released and do not intend to release an RFP for these services.

Whether you check YES or NO, you must list below the Telecommunications Services you seek. Specify each service or function (e.g. local voice service) and quantity and/or capacity(e.g. 20 existing lines plus 10 new ones.) See the Eligible Services List at www.sl.universalservice.org for examples of eligible Telecommunications Services. Remember that only eligible telecommunications providers can provide these services under the universal service support mechanism.

☒ Check this box if you prefer discounts on your bill.

☒ Check this box if you prefer reimbursement after paying your bill in full

☐ Check this box if you do not have a preference.

1)

Service or Function
VoIP district wide
Quantity and/or Capacity
50 lines

Entity Number : 129908

Applicant's Form Identifier : PS10470VIP

Contact Person : Mindy Marik

Contact Telephone Number : 937-452-1284

Block 2: Summary Description of Needs or Services Requested(Continued)

10 Internal Connections Other than Basic Maintenance

Do you have a Request for Proposal(RFP) that specifies the services you are seeking? If you check YES, your RFP must be available to all interested bidders for atleast 28 days. If you check YES and your RFP is not available to all interested bidder, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.

☒ YES, I have released or intend to release an RFP for these services. It is available or will become available on the Web at:

a

or via (check one) ☐ the Contact Person in Item 6 or

☐ the Technical Contact Person in Item 12.

b

☒ NO. I have not released and do not intend to release an RFP for these services.

Whether you check YES or NO, you must list below the Internal Connections you seek. Specify each service or function (e.g. a router, hub and cabling) and quantity and/or capacity(e.g. connecting 1 classroom of 30 students.) See the Eligible Services List at www.sl.universalservice.org for examples of eligible Internal Connections services. Attach additional pages if needed.

☒ Check this box if you prefer discounts on your bill.

☒ Check this box if you prefer reimbursement after paying your bill in full

☐ Check this box if you do not have a preference.

Entity Number : 129908

Applicant's Form Identifier : PS10470VIP

Contact Person : Mindy Marik

Contact Telephone Number : 937-452-1284

Block 2: Summary Description of Needs or Services Requested(Continued)

11 Basic Maintenance of Internal Connections

Do you have a Request for Proposal(RFP) that specifies the services you are seeking? If you check YES, your RFP must be available to all interested bidders for atleast 28 days. If you check YES and your RFP is not available to all interested bidder, or if you check NO and you have or intend to have an RFP, you risk denial of your funding requests.

☒ YES, I have released or intend to release an RFP for these services. It is available or will become available on the Web at:

a

or via (check one) ☒ the Contact Person in Item 6 or

☒ the Technical Contact Person in Item 12.

b

☒ NO. I have not released and do not intend to release an RFP for these services.

Whether you check YES or NO, you must list below the Internal Connections you seek. Specify each service or function (e.g. a router, hub and cabling) and quantity and/or capacity(e.g. connecting 1 classroom of 30 students.) See the Eligible Services List at www.sl.universalservice.org for examples of eligible Internal Connections services. Attach additional pages if needed.

☒ Check this box if you prefer discounts on your bill.

☒ Check this box if you prefer reimbursement after paying your bill in full

☐ Check this box if you do not have a preference.

Entity Number : 129908

Applicant's Form Identifier : PS10470VIP

Contact Person : Mindy Marik

Contact Telephone Number : 937-452-1284

Block 2: Summary Description of Needs or Services Requested(Continued)

(Optional) Please name the person on your staff or project who can provide additional technical details or answer specific questions from service providers about the services you are seeking. This need not be the contact person listed in Item 6 nor the Authorized Person who signs this form.

Name

Title

Telephone Number

Fax Number

E-mail Address

13 ☐ Check this box if there are any restrictions imposed by state or local laws or regulations on how or when service providers may contact you or on other bidding procedures. Please describe below any such restrictions or procedures and/or provide a Web address where they are posted and a contact name and telephone number.

a ☐ Check this box if no state and local procurement/competitive bidding requirements apply to the procurement of services sought on this Form 470.

13b If you have plans to purchase additional services in future years, or expect to seek new contracts for existing services, you may summarize below(including the likely timeframes). If you are requesting services for a funding year for which a Form 470 cannot yet be files online, include that information here.

Would like VoIP throughout the District with possibility for future growth

Entity Number : 129908

Applicant's Form Identifier : PS10470VIP

Contact Person : Mindy Marik

Contact Telephone Number : 937-452-1284

Block 3: Technology Resources

14 ☒ Basic telephone service only: If your application is for basic telephone services and voice mail only, check this box and skip to Item 16. Basic telephone service is defined as wireline or wireless single line voice service(local, cellular/PCS, and/or long distance) and mandatory fees associated with such service(e.g., federal and state taxes and universal service fees).

Although the following services and facilities are ineligible for support, they are usually necessary to make effective use of the eligible services requested in this application. Unless you indicated in Item 14 that your application is ONLY for basic telephone service, you must check at least one or both boxes 15a through 15e. You may provide details for purchases being sought.

Desktop software: Software required

a. ☒ has been purchased; and/or

☒ is being sought

Electrical systems:

b. ☒ adequate electrical capacity is in place or has already been arranged; and/or

☒ upgrading for electrical capacity is being sought.

Computers : a sufficient quantity of computers

c. ☒ has been purchased; and/or

☒ is being sought

Computer hardware maintenance: adequate arrangements

d. ☒ have been made; and/or

☒ are being sought

Staff development:

e. ☒ has been purchased; and/or

☒ is being sought

f. Additional details: Use this space to provide additional details to help providers to identify the ineligible services you desire.

Block 4: Recipients of Service

16 Eligible Entities That Will Receive Services:

Check the ONE choice (Item 16a, 16b or 16c) that best describes this application and the eligible entities that will receive the services described in this application. You will then list in Item 17 the entity/entities that will pay the bills for these services.

a. ☒ Individual school or single-site library.

b. ☒ State wide application for (enter 2-letter state code) ☐ representing(check all that apply):

☒ All Public schools/districts in the state.

☒ All non-public schools in the state.

☒ All libraries in the state.

c. ☒ School district, library system or consortium application to serve multiple eligible entities(see next page).

Does your application include INELIGIBLE entities? ☒ No ☐ Yes. If yes, complete item 18.

Entity Number : 129908		Applicant's Form Identifier : PS10470VJP	
Contact Person : Mindy Marik		Contact Telephone Number : 937-452-1284	
Block 4: Recipients of Service(Continued)			
16c <input checked="" type="checkbox"/> School district, library system, or consortium application to serve multiple eligible entities:			
Number of eligible entities 4			
For these eligible entities, please provide the following:			
Area Codes(list each unique area code)		Prefixes associated with each area code (first 3 digits of 7-digit phone number)	
1) 937		452 787	

Entity Number : 129908

Applicant's Form Identifier : PS10470VIP

Contact Person : Mindy Marik

Contact Telephone Number : 937-452-1284

Block 4: Recipients of Service(Continued)

17 囑 List the entity/entities that will be paying the bills directly to the provider for the services requested in this application. These are known as Billed Entities. At least one line of this ite must be completed. If a Billed Entity cite on your Form 471 is not listed below, funding may be denied for the funding requests associated with this Form 470. Attach additional pages if needed.

Entity Number	Entity
1) 129908	PREBLE SHAWNEE SCHOOL DISTRICT
2) 50093	CAMDEN ELEMENTARY SCHOOL
3) 50094	SHAWNEE HIGH SCHOOL
4) 49558	WEST ELKTON ELEMENTARY SCHOOL

Entity Number : 129908

Applicant's Form Identifier : PS10470VIP

Contact Person : Mindy Marik

Contact Telephone Number : 937-452-1284

Block 4: Recipients of Service(Continued)

18 Ineligible Participating Entities: List the names of any entity/entities here for whom services are requested that are not eligible for the Universal Service Program. Attach additional pages if needed.

Ineligible Participating Entity	Area Code and Prefix of Entity
---------------------------------	--------------------------------

Entity Number : 129908

Applicant's Form Identifier : PS10470VIP

Contact Person : Mindy Mark

Contact Telephone Number : 937-452-1284

Block 5: Certification and Signature

19 ☒ I certify that the applicant includes: (Check one or both.)

a ☒ schools under the statutory definitions of elementary and secondary schools found in the **No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801 (18) and (38)**, that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or

b ☒ libraries or library consortia eligible for assistance from a state library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any school (including, but not limited to elementary and secondary schools, colleges, and universities).

I certify that all of the individual schools, libraries, and library consortia receiving services under this application are covered by technology plans that are written, that cover all 12 months of the funding year, and that have been or will be approved by a state or other authorized body, and an SLD-certified technology plan approver, prior to the commencement of service. The plans were written at the following level(s):

a ☒ individual technology plans for using the services requested in this application; and /or

b ☒ higher-level technology plans for using the services requested in this application; or

c ☒ no technology plan needed: application requests basic telephone service only.

I certify that I will post my Form 470 and (if applicable) make my RFP available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted will be carefully considered and the bid selected will be for the most cost-effective service or equipment offering, with price being the primary factor, and will be the most cost-effective means of meeting educational needs and technology plan goals. I certify that I will retain required documents for a period of at least five years after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.

I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. Sec. 54.500(k). Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

I acknowledge that support under this support mechanism is conditional upon the school(s) and/or library(ies) I represent securing access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies). I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

I certify that I have reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that I have complied with them. I acknowledge that persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec 1001.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program.

Entity Number : 129908

Applicant's Form Identifier : PS10470VIP

Contact Person : Mindy Mark

Contact Telephone Number : 937-452-1284

Block 5: Certification and Signature

27 Signature of authorized person

28 Date

29 Printed

name of

authorized

person:

Dale Robertson

30 Title or

position of

authorized

person:

Superintendent

31 Address

of

authorized

person:

124 Bloomfield Street

City

Camden

State

OH

Zip Code

45311

31b

Telephone

number of

authorized

person:

937-452-1283

31c Fax number of authorised person

937-452-3926

31d E-mail

address of

authorized

person

psu_dr@swoca.net

Name of authorized person's employer

Preble Shawnee Local Schools

Entity Number : 129908

Applicant's Form Identifier : PS10470VIP

Contact Person : Mindy Marik

Contact Telephone Number : 937-452-1284

Block 5: Certification and Signature(Continued)

NOTICE: Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Description of Services Requested and Certification Form (FCC Form 470) with the Universal Service Administrator, 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, information provided in or submitted with this form or in response to subsequent inquiries may also be subject to disclosure consistent with the Communications Act of 1934, FCC regulations, the Freedom of Information Act, 5 U.S.C § 552, or other applicable law.

If you owe a past due debt to the federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

Please submit this form to:

SLD-Form 470
P.O. Box 7026
Lawrence, Kansas 66044-7026
1-888-203-8100

For express delivery services or U.S. Postal Service, Return Receipt Requested, mail this form to:

SLD-Forms 470
ATTN: SLD Form 470
3833 Greenway Drive
Lawrence, Kansas 66046
1-888-203-8100